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REMARKS

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The Applicant appreciates the thorough review of the application by the Examiner.

Reconsideration and allowance are requested.

Claims 1-3 remain pending in the present application, with Claim 1 being an independent claim.

Claims 1-3 are patentable under 35 U.S.C. 103(a) over Platt (US 1,666,347) in view of Rosa (6,113,472).

The Examiner puts forth that a person skilled in the art starting with the technology of Platt, which has been available since 1926, and faced with the problem of specifically grinding edges or roundings, should then seek the solution in Rosa. However, it should also be assumed that the person who made the invention which has been disclosed in Rosa is skilled in the art. Accordingly, the person skilled in the art at the time when the technology according to Rosa was developed would have had the opportunity to make such combinations if it should be obvious.

Accordingly, if we follow the argumentation given by the Examiner, the skilled person had the knowledge of Platt, which had been common knowledge for more than 70 years when the solution according to Rosa was proposed. However, the skilled person who found a solution, which is described in Rosa and which relates to the specific problem of polishing a complex component/a gravure roller, did not propose a combination of the technology involving the annular conveying means that is used according to Rosa in connection with individually controlling each grinding element together with the solution which was known from the old Platt document. This is a clear demonstration that it would not be obvious for a skilled person to combine the teaching of these two documents.

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The problem of providing an efficient grinding operation in order to efficiently deburr holes, edges and roundings has existed for several decades. Moreover, the knowledge of the solution according to Platt has been known for more than 70 years. Even though according to Rosa the technology has been available, and even though the problem existed then, there are more examples of earlier proposals for solving the problem. One of the proposals for solving the problem is disclosed in Rosa and other proposals are mentioned in the description. None of these proposals for solving the problems have suggested or even given a hint to provide for a solution involving the combination of features which have been stated in the independent claim 1 of the present application. The combination of Platt and Rosa as suggested by the Examiner is not obvious.

In addition, a combination of Platt and Rosa fails to teach or suggest all the claim limitations of the present invention. Applicant notes that in the Examiner's opinion Platt discloses the closest prior art. However, Examiner appears to argue that with a starting point of the closest prior art in Platt, the only distinguishing feature of the present Application is that each grinding head has its own grinding motor driving an associated grinding element.

With this point of view it is essential to evaluate whether the most relevant technology is the technology of each grinding head having its own grinding motor, making it possible to individually drive an associated grinding element, or the feature that the conveyor means has at least one long side perpendicular to an underlying conveyor upon which the work piece is placed which is to be grinded by the apparatus.

It should also be noted that the present invention defines the support arrangement for the grinding heads as an endless conveying means for the grinding heads. This is different from the teaching of Platt. The support arrangement disclosed in Platt is a guide 6 which supports the

polishing blocks. The polishing blocks are moved by a chain 14 which could be said to be an endless conveying means. However, it is clear that the conveying means used in Platt does not constitute a support arrangement and does not have at least one long side perpendicular to an underlying conveyor. Moreover, it is also noted that Platt differs in that polishing blocks are disclosed having more polishing members 9. Also, the rotary direction of the polishing blocks of any subsequent polishing member 9 will always be the same along one of the guide bars 6 (support arrangement). This situation clearly will not make it possible to efficiently deburr holes, edges and roundings. Accordingly, a skilled person working with the problem of efficiently deburring holes, edges and roundings would not make use of the teaching of Platt.

Limitations of Applicant's claims are neither disclosed nor rendered obvious by the references. For at least the reasons given above, the rejection of Claims 1-3 under 35 U.S.C. § 103(a) is improper, and should be withdrawn.

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CONCLUSION

Reconsideration and allowance are respectfully requested.

Respectfully,

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